

**EXPLANATION OF SIGNIFICANT DIFFERENCES
BENDIX FLIGHT SYSTEMS DIVISION SUPERFUND SITE
SOUTH MONTROSE, SUSQUEHANNA COUNTY, PENNSYLVANIA**

A. Introduction

The Environmental Protection Agency, Region III (EPA) is issuing this Explanation of Significant Differences (ESD), pursuant to its authority in Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. § 9617(c), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), at 40 C.F.R. § 300.435(c)(2)(i), for the September 30, 1988, Record of Decision (ROD) (no. 197, Section III, in the Administrative Record Index for the Site) issued for the Bendix Flight Systems Division Superfund Site (Site) in South Montrose, Pennsylvania. EPA is the lead agency for the Site and the Pennsylvania Department of Environmental Protection (PADEP) is the support agency. EPA has identified an aspect of the Site remedy that is appropriate to change through this ESD. EPA has determined that this change does not fundamentally alter the remedy selected in the ROD with respect to scope, performance, or cost. This ESD will become part of the administrative record file located in EPA Region III and the offices of the Susquehanna Planning Commission at the addresses listed below in Section F.

B. Summary of Site History, Contamination Problems, and Selected Remedy

The Bendix Superfund Site is an active aircraft instrument manufacturing plant. From 1952 to 1978, solvents used in degreasing operations were disposed into the onsite wastewater treatment system, into a series of earthen trenches and onto the ground surrounding the plant. The disposal practices resulted in contamination of the soil and groundwater, with chemicals including trichloroethylene ("TCE"), perchloroethylene ("PCE"), 1,1,1-trichloroethylene ("TCA"), vinyl chloride, benzene, and xylene (hereinafter collectively referred to as "VOCs"). The contaminants are "hazardous substances" as defined in Section 101(14) of CERCLA.

For a more detailed summary of site history, and contamination problems, see Sections III (page 1) and V (page 2) of the ROD. For a description of the remedy as set forth in the ROD, see Section XII (page 24).

C. Significant Differences: Rationale

Selected Remedy for the Contaminated Soil Areas.

There are two major areas of VOC contaminated soils at the Site; the area to the east of the Bendix plant, and the area to the west of the plant. The selected remedy

alternative for the soils on the east side of the plant was excavation and mechanical aeration, and for the soils on the west side of the plant the selected remedy was vacuum extraction. One of the main reasons vacuum extraction was selected for the west side of the plant was because there were numerous buried utilities in this area making soils excavation and aeration (as selected for the east side) both hazardous and environmentally inefficient. In 1991 a vacuum extraction and soil dewatering pilot study was performed to assess the effectiveness of this technology and to gather information for designing the site remedies. This study and other remedial work at the Site found vacuum extraction to be technically and physically impractical due to the nature of the soils in this area (glacial till). Furthermore, the impediments to excavation and soil aeration, i.e. the buried utility lines, were removed by relocating them overhead.

Therefore, the responsible party requested that the remedy be changed to provide for soil excavation and aeration on the west side of the plant instead of vacuum extraction. EPA has decided that it is appropriate to make this change. This ESD modifies the Record of Decision; however, the attainment levels and levels of protection remain unchanged.

In summary, this ESD allows for the same remedial action (i.e. mechanical soils aeration) to occur for soils on the west side of the plant as was specified in the Record of Decision for the east side of the plant.

D. Affirmation of Statutory Determinations

Considering the new information that has been developed and the changes that have been made to the selected remedy, EPA believes that the remedy, as modified by this ESD, remains protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to this remedial action, and is cost-effective. In addition, the revised remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable for this Site.

E. Support Agency Comments

The above changes to the remedy have been coordinated with representatives of PADEP pursuant to 40 C.F.R. § 300.435(c)(2)(i). PADEP verbally concurred on November 13, 1995 with changes to the selected remedy as described in this ESD.

F. Public Participation Activities

As required by 40 C.F.R. § 300.435(c)(2)(i), notice of this ESD will be published in the local newspaper. This ESD is part of the administrative record file and is available for review at the two locations identified below:

AR301681

E. Support Agency Comments

The above changes to the remedy have been coordinated with representatives of PADEP pursuant to 40 C.F.R. §300.435(c)(2)(i). PADEP verbally concurred on November 13, 1995 with changes to the selected remedy as described in this ESD.

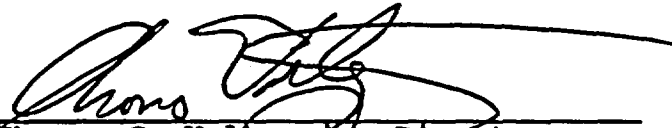
F. Public Participation Activities

As required by 40 C.F.R. § 300.435(c)(2)(i), notice of this ESD will be published in the local newspaper. This ESD is part of the administrative record file and is available for review at the two locations identified below:

United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107
(215) 597-3037
Hours: 8:30 a.m. to 5:00 p.m.
Monday through Friday

Susquehanna County Planning Commission
31 Public Avenue
Montrose, PA 18801
(717) 278-4600
Hours: 8:00 a.m. to 5:00 p.m.
Monday through Friday

11/22/98
Date


Thomas C. Voltaggio, Director
Hazardous Waste Management Division

AR301682